

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

V.

**VALERIE WILSON,
a/k/a "Mary,"**

Defendant.

CRIMINAL NO. 2:16cr97

STATEMENT OF FACTS

By signing below, the parties and their respective counsel agree that if this case had gone to trial, the government's evidence would have established the following facts beyond a reasonable doubt:

1. From in or about March 2012 to in or about July 2016, the defendant, VALERIE WILSON, was a member of a drug trafficking conspiracy that primarily operated in Portsmouth and Chesapeake, Virginia. The defendant entered into a conspiracy with other individuals to purchase, manufacture, distribute, and possess with intent to distribute any amount of heroin in the Eastern District of Virginia and elsewhere.

2. From on or about October 16, 2015, in Portsmouth, Virginia, the defendant facilitated the sale of approximately six grams of heroin for an amount of United States currency.

3. From in or about March 2016 to in or about June 2016, the defendant purchased heroin from co-conspirators, MARQUE WILSON and NATHANIEL POWELL for the purpose of transportation and resale of that heroin in North Carolina.

4. On or about June 2, 2016, in Moyock, North Carolina, the defendant sold

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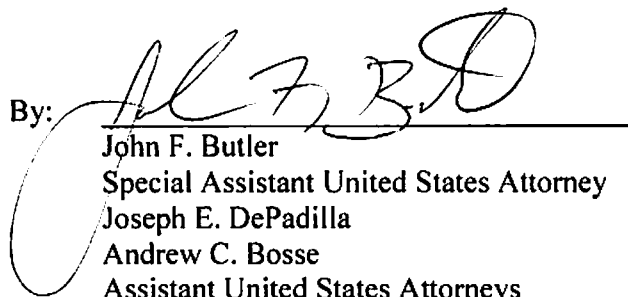
approximately five grams of heroin for an amount of United States currency.

5. The acts taken by the defendant in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case, nor does it identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that he is obligated under her plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

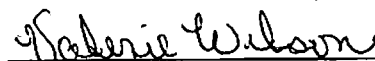
Dana J. Boente
United States Attorney

By:


John F. Butler
Special Assistant United States Attorney
Joseph E. DePadilla
Andrew C. Bosse
Assistant United States Attorneys

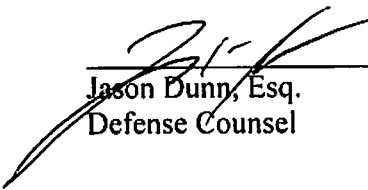
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V.W. JB

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Valerie Wilson, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Valerie Wilson, Defendant

I am the attorney for defendant, Valerie Wilson. I have carefully reviewed the above Statement of Facts with her. Her decision to enter into this factual stipulation is knowing, intelligent, and voluntary.



Jason Dunn, Esq.
Defense Counsel

SP
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JTB